

PTO/SB/21 (09-04)

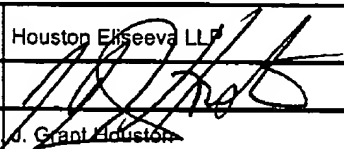
Approved for use through 07/31/2006. OMB 0651-0031

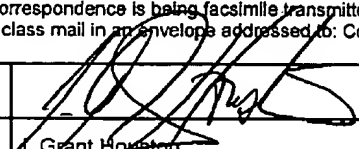
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<b>TRANSMITTAL FORM</b>  (to be used for all correspondence after initial filing)	Application Number	09/777,550	
	Filing Date	February 5, 2001	
	First Named Inventor	David J. Wetherall	
	Art Unit	2151	
	Examiner Name	Phillips, Hassan A.	
Total Number of Pages in This Submission	6	Attorney Docket Number	0016.0006

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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In Re: David J. Wetherall Confirmation No: 8207  
Serial No: 09/777,550 Group: 2151  
Filed: February 5, 2001 Examiner: Phillips,  
Hassan A.

For: Network Traffic Regulation  
Including Consistency Based  
Detection and Filtering of Packets  
with Spoof Service Addresses

Customer No.: 29127

Attorney 0016.0006US1  
Docket No.

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Sir:

This is the Applicants'-Appellants' Reply to the Examiner's Answer of December 30, 2005.

The following summarizes claim limitation distinctions that were presented in the Appellants' Brief and unanswered in the Examiner's Answer.

First, recall that each of the claims is directed to ways of identifying "spoof source addresses".

Relative to Claim 2:

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Claim 2 requires that spoof source addresses are determined based on spatial distribution profiles.

In response, the Examiner's Answer argued that the claimed "spatial distribution profiles" are the same as the Porras "continuous measures". See Answer at page 15.

Even we with accept this unsubstantiated assumption, the Answer does not argue that Porras teaches to detect spoof source addresses based on "spatial distribution profiles" or the Porras "continuous measures".

Thus, the arguments of the Answer do not address the specific limitations of claim 2. There is no *prima facie* anticipation.

Relative to Claim 4:

Claim 4 requires that spoof source addresses are determined based on destination source address range (DSAR) distribution profiles.

In response, the Examiner's Answer argued that the claimed "destination source address range (DSAR) distribution profiles" are the same as the Porras "categorical measures". See Answer at pages 17-18.

Even we with accept this assumption, the Answer does not argue that Porras teaches to detect spoof source addresses based on "destination source address range (DSAR) distribution profiles" or the Porras "categorical measures".

Thus, the arguments of the Answer do not address the specific limitations of claim 4. There is no *prima facie* anticipation.

Relative to Claim 6:

Claim 6 requires that spoof source addresses are determined based on migration distribution profiles of the source addresses.

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In response, the Examiner's Answer argued that the claimed "migration distribution profiles of the source addresses" are the same as the Porras "continuous measures". See Answer at page 20.

Nevertheless, the Answer does not argue that Porras teaches to detect spoof source addresses based on "migration distribution profiles of the source addresses" or the Porras "continuous measures".

Thus, the arguments of the Answer do not address the specific limitations of claim 6. There is no *prima facie* anticipation.

Relative to Claim 8:

Claim 8 requires that spoof source addresses are determined based on timing distribution profiles of the source addresses.

In response, the Examiner's Answer argued that the claimed "timing distribution profiles of the source addresses" are the same as the Porras "continuous measures". See Answer at page 23.

The Answer does not argue that Porras teaches to detect spoof source addresses based on "timing distribution profiles" or the Porras "continuous measures".

Thus, the arguments of the Answer do not address the specific limitations of claim 8. There is no *prima facie* anticipation.

Relative to Claim 10:

On page 25 of the Answer, the Examiner agreed that Porras does not teach determining whether filtering actions are to be taken to filter out packets with source addresses that are deemed to be spoofed source addresses and how those filtering actions should be distributed among the routing devices as required by claim 10.

Yet on page 26, the Answer argues that the Porras patent 'implies' such teachings to the Examiner.

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Counsel is not familiar this new legal standard being proposed in the Answer: anticipation by 'implication'.

#### Summary

The present claimed invention is directed to using very specific types of profiles, e.g., spatial distribution profile, destination source address range (DSAR) distribution profile, migration distribution profile of the source addresses, and timing distribution profile of the source addresses, to determine whether instances of source addressed are spoof source addresses.

The Porras patent is of technical interest insofar as it teaches general types of profiles, termed categorical or continuous measures.

What is missing from the Porras patent, however, are teachings of the specific claimed profiles--spatial distribution profiles, destination source address range (DSAR) distribution profiles, migration distribution profiles of the source addresses, and timing distribution profiles of the source addresses.

Moreover, the Porras patent does not teach that even its continuous or categorical measures should be used to detect address spoofing. The continuous or categorical measures are generated by the Porras profile engine 22. See Porras patent at col. 5, lines 50-53. Whereas, the Porras patent uses its signature engine 24 to detect spoofing. See Porras patent at col. 7, 43-44. Signature detection uses pattern matching instead of statistical profiling to detect problems.

For these reasons, Applicants-Appellants believe that the above-discussed claims, and their analogs, are not anticipated by the applied reference.

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Should any questions arise, please contact the undersigned.

Respectfully submitted,

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Date: February 28, 2006